

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

1. GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-22-00702-JD
vs.	)	Judge Jodi W. Dishman
	)	
2. FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
3. SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
4. TYLON MACKEY;	)	
5. ISRAEL JUAREZ;	)	
6. ORD TRUCKING, INC.	)	
7. ZURICH AMERICAN INS. CO.,	)	
	)	
Defendants,	)	
	)	
	)	
Intervenor.	)	
	)	
8. ZURICH AMERICAN INS. CO.,	)	
	)	
Defendant/Third Party Plaintiff,	)	
	)	
vs.	)	
	)	
9. BERKSHIRE HATHAWAY	)	
HOMESTATE INS. CO., and	)	
10. PROGRESSIVE NORTHERN INS. CO.,	)	
	)	
Third-Party Defendants.	)	

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to LCvR 83., Michael J. Masterson and the law firm of Wilburn, Masterson & Hampton, respectfully move this Court for an Order allowing them to withdraw as counsel of record for Defendant/Third Party Plaintiff, Zurich American Insurance Company (“ZAIC”), in this action. In support of this Motion, counsel states as follows:

1. Michael J. Masterson and the law firm of Wilburn, Masterson & Hampton will no longer be counsel for Defendant/Third Party Plaintiff ZAIC after May 19, 2023, as Mr. Masterson is retiring from his law practice.

2. As of May 20, 2023, Amy E. Hampton will no longer be associated with the law firm of Wilburn, Masterson & Hampton. The client has been notified that Michael J. Masterson is retiring and the client has given their approval for Amy E. Hampton to continue as counsel for Defendant/Third Party Plaintiff ZAIC after May 19, 2023. Ms. Hampton already has an Entry of Appearance on file in this case. Ms. Hampton will be continuing her representation on behalf of Defendant/Third Party Plaintiff ZAIC at the firm of Aston Mathis Campbell PLLC. Below is Ms. Hampton's new contact information:

Amy E. Hampton  
Aston Mathis Campbell PLLC  
2642 E. 21<sup>st</sup> Street, Suite 250  
Tulsa, Oklahoma 74114-1726  
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3. A Scheduling Order (Doc. No. 56) has been entered in this case and the discovery cutoff is set for November 7, 2023.

4. No deadlines or future hearings will be adversely affected, and no party will be prejudiced by Movants' withdrawal from this case.

5. This request is made in good faith and not for the purposes of delay or harassment.

6. This Motion is being submitted to the Court with a proposed Order allowing Mr. Masterson and the law firm of Wilburn, Masterson & Hampton to withdraw.

WHEREFORE, Michael J. Masterson and the law firm of Wilburn, Masterson & Hampton respectfully request that this Court enter an Order granting this Motion allowing them to withdraw as counsel of record in this case for Defendant/Third Party Plaintiff ZAIC.

Respectfully Submitted,

**WILBURN, MASTERSON & HAMPTON**

By   
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*Zurich American Insurance Company*

**CERTIFICATE OF MAILING**

I, Michael J. Masterson, hereby certify that on this 23rd day of May, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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**MICHAEL J. MASTERSON**

MJM/kw